

**UNITED STATES DISTRICT COURT  
DISTRICT OF BOSTON, MASSACHUSETTS**

SUFFOLK, ss

Docket No: 05 CV 11096 06

Donna Layne,  
Plaintiff

v.

Lori Bullen,  
Marsha Cannon,  
Inspector Harrington,  
Allen Douillette,  
Defendants

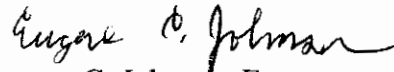
**PLAINTIFF'S MOTION TO  
AMEND THE COMPLAINT**

**Now Comes**, Donna Layne, by and through her attorney Eugene C. Johnson, pursuant to the Federal Rules of Civil Procedure, Rule 15, respectfully moves this court to grant Plaintiff leave to amend her complaint to include the United States Postal Service for the following reasons:

1. The Defendants named in the above captioned matter are all agents of the United States Postal Service, as such; the United States Postal Service is vicariously liable for their tortious acts/conduct.
2. The policies and procedures followed by the Defendants were issued by the United States Postal Service.
3. The United States Postal Service is an indispensable party to the litigation.

October 4, 2005

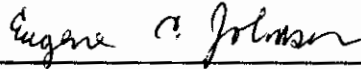
Donna Layne  
By her attorney,



Eugene C. Johnson, Esq.  
BBO #: 659713  
264 Broadway  
Suite 502  
Methuen, Massachusetts 01844  
(978) 691-5544

Certificate of Service

Under pain and penalty of perjury, I, Eugene C. Johnson, certify that a copy of the above document and accompanying affidavit were served, postage prepaid, to Defendants at their usual place of employment.



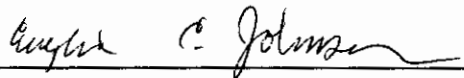
October 4, 2005

Eugene C. Johnson, Esq.

Affidavit In Support Of  
The Motion To Amend Complaint

I, Eugene C. Johnson, under pains and penalties of perjury, state the following to be true and accurate:

1. I am a member of the Massachusetts Bar Association and I am in 'good' standing.
2. I filed a complaint on the behalf of my client, Donna Layne, in the Boston District Federal Court District of Massachusetts on May 16, 2005.
3. Defendants were served a copy of the complaint on or about September 7, 2005.
4. The United States Postal Service is an essential party to this action.
5. Justice cannot be served if the United States Postal Service is precluded from this action.



October 4, 2005

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